



November 11, 2013

BY FEDERAL EXPRESS AND E-MAIL

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Reference: Status Report — January 22, 2013 Notice of Violation (NOV)  
Canton Drop Forge  
4575 Southway Street SW, Canton, Ohio  
EPA ID #OHD004465142

Dear Messrs. Weiler, Beedle and Kennedy:

As a follow-up to the September 13, 2013 status report, Canton Drop Forge (CDF) is providing this status report to keep USEPA and Ohio EPA current on the continued progress we are making towards environmental improvements at our facility. CDF continues to be proactive in taking measures to prevent future oil releases to the ponds as well as to clean-up earlier releases. This report conveys the following information:

1. Update on status of oil-water separator improvements and process water discharge; and
2. Discussions with Ohio EPA

We have been conducting daily inspections: no on-going oil releases to the ponds are occurring. CDF has performed inspections of the existing oil-water separator and has pumped the accumulated oil to prevent discharges to the ponds. Dewatering of Pond 1 and Pond 2 has

continued in preparation for initiation of the next phases of work: installation of the oil/water separators, reuse of process water, excess recycled water arrangements with the sanitary sewer district, and removal of materials from the base of Ponds 1 and 2 for off-site disposal.

## **1. Oil-Water Separator Improvements and Process Water Discharge**

CDF continues to make progress finalizing and implementing plans for process piping and treatment modifications to prevent the release of process water and oil to the on-site storm water retention ponds as detailed in the previous status report.

As noted in the September 13, 2013 status report, water processed through the new OWS will be pumped to CDF's existing water reclaim system for reuse as cooling water or as boiler feed water. Excess recycled water will be discharged to the Stark County Sanitary Sewer with ultimate discharge to the City of Massillon's Waste Water Treatment Plant (WWTP). We submitted a Permit-to-Install application to Ohio EPA Northeast District Office, to City of Massillon WWTP, and to Stark County Sanitary Engineers on September 16, 2013. CDF has been in regular telephone and e-mail communication over the past two months with Ohio EPA-Northeast District Office, City of Massillon, and Stark County to provide additional information and to answer questions regarding issuing the PTI. Additionally, we prepared a written response to Ohio EPA's comments on October 29, and we are submitting a supplemental response this week to resolve each of the Ohio EPA comments. Based on the latest telephone communications with City of Massillon reviewers last week, we expect to receive their final comments this week; we will respond as quickly as possible to answer any questions that they may have. Also, per telephone communications last week, Stark County indicated that they will provide any comments at the conclusion of a short duration flow study that they are completing downstream of CDF's facility. Stark County personnel expected this flow study to be completed within the next two weeks.

The OWS has been fabricated and will be delivered to our site and installed as soon as the PTI is approved. We have received construction bids for the project from contractors. Installation of the OWS will start following PTI approval.

## **2. Discussion with Ohio EPA**

A conference call with Ohio EPA, Canton Drop Forge (CDF) and TRC was held October 24, 2013 to discuss the closure of Pond 1 and Pond 2. Ohio EPA was represented by Ed Lim, DERR Engineering Section Manager, along with Eric Hagen (Environmental Specialist, DERR, Central Office), Pete Whitehouse (Assistance Chief, DERR), Kevin Polombo (Environmental Specialist DERR, NEDO), Sue Netzly-Watkins (Environmental Specialist, DERR NEDO), and Ron Shadrach (NEDO). Ed Lim described two options for achieving resolution of the environmental issues at the CDF site:

1. Close Ponds 1 and 2 as surface impoundments following Resource Conservation and Recovery Act (RCRA) closure guidance, and address the remaining site conditions under the Ohio VAP-MOA Track. The two ponds would be the only "Units" requiring closure under this approach.
2. Close Ponds 1 and 2 and the remainder of the site following the RCRA Corrective Action (CA) process.

CDF is evaluating proceeding with preparing a Closure Plan for the ponds pursuant to Option 1 to achieve “clean” closure through removal of all “waste” (used oil and bottom materials) within the unit boundaries that are established in the Closure Plan. This will include removal of the clay liner and treated bio-cell material that was placed beneath Pond 1 in 1997 to 1998.

Ed Lim stated that CDF could submit a draft Closure Plan for their review and comment whenever we are ready. He stated that from their review, additional sampling of the ponds or installation of new wells was not necessary prior to submitting the draft Plan. Once any comments on the draft Plan are addressed, the final Plan will be submitted for Ohio EPA final review and for the required 45 day public notice period.

Ed Lim called Don Fay on October 25, 2013. He had spoken to Brian Kennedy USEPA about the closure process and our discussions on the conference call. Brian told Ed that we would not be able to submit a final Closure Plan until the Consent Agreement and Final Order (CAFO) was signed between USEPA and CDF. Ed did not think this would affect our ability to plan the closure or submit a draft Plan while the CAFO is being negotiated and executed.

The remediation and closure of Pond 1 and Pond 2 is anticipated to begin in spring of 2014, as soon as the OWS and process water improvements are on-line and weather conditions permit. The site ponds will continue, both during remediation and following its completion, to be used for storm water retention. No process water will be discharged to ponds in the future, and measures will be taken to prevent impacted storm water from reaching them (e.g., storm water oil-water separators and other storm water pollution best management practices).

### **Closing**

We look forward to continuing our discussion about resolving the NOV issues in an efficient and timely manner. We are available for a conference call at your convenience if you would like to discuss these issues further.

**Canton Drop Forge, Inc.**



Brad Ahbe  
President

**TRC Environmental Corporation**



Donald A. Fay, Ohio VAP C.P. # 254  
Vice President

### **Attachments**

cc: Kevin Palombo – Ohio EPA Northeast District Office  
Mark Navarre – Ohio EPA Central Office  
Todd Anderson – Ohio EPA Central Office  
Sue Kroeger – Ohio EPA Central Office  
Ed Lim – Ohio EPA Central Office  
Eric Hagen – Ohio EPA Central Office  
Kim K. Burke – Taft, Stettinius & Hollister LLP